



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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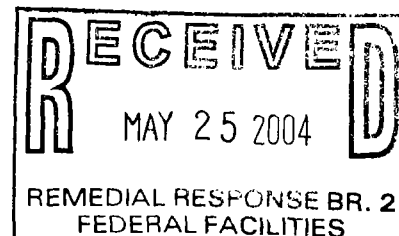
ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217-782-6760

May 20, 2004

Major David Quivey
Chief, Military Construction Division
Department of the Army
Assistant Chief of Staff for Installation Management
Army Reserve Division
600 Army Pentagon
Washington, DC 20310-0600



EPA Region 5 Records Ctr.



370681

Re: Responses to Comments

0312765079 -- Cook County
Fort Dearborn Army Reserve
Superfund/Technical Report

Dear Major Quivey:

The Illinois Environmental Protection Agency ("Illinois EPA" or "Agency") has reviewed the U.S. Army's March 17, 2004 dated responses to Agency comments on the *Draft Construction Completion Report for Various Site Remediations for the former Fort Dearborn Army Reserve Center, Chicago, Illinois* (Montgomery Watson Harza Americas, Incorporated), April 2003. These responses were received on March 19, 2004.

For the most part, the Agency found the Army's responses acceptable. However, there were two issues pertaining to the risk evaluation that will require revision.

Agency comments on the Army's responses are as follows:

1. Response to Comment #5: The Polycyclic Aromatic Hydrocarbon ("PAH") risk evaluation contained in Attachment A has been developed in accordance with Agency procedures with the exception of the calculation of the exposure point concentrations ("EPCs"). The EPCs have been calculated according to outdated United States Environmental Protection Agency ("USEPA") guidance from 1992. However, the Agency now specifies that guidance from 2002 (*Calculating Upper Confidence Limits for Exposure Point Concentrations at Hazardous Waste Sites*, OSWER 9285.6-10, December 2002) be used for EPCs.
2. Response to Comment #7: No further comment.
3. Response to Comment #12: The evaluation of risks due to the essential nutrient iron contained in Attachment C has been developed inappropriately. The evaluation correctly

determines the level of iron exposure from ingesting soil, but there is no evaluation of the total amount of daily iron intake. The evaluation of the total daily intake of nutrients from all sources (diet, drinking water, and air if appropriate) for risk assessments of nutrient chemicals is required.

Please place a copy of this letter in the administrative record for this site. If you would have any questions or require additional information, please contact me at (217) 785-6020 or via e-mail at *Andrew.Jankowski@epa.state.il.us*

Sincerely,



Andrew J. Jankowski, Project Manager
Federal Facilities Unit
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

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c: Karen Mason-Smith, SRF-6J, USEPA Region 5
John Vranicar, Ironwood Company
Doug Meadors, US Army Corps of Engineers – Louisville District